

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:14-CR-00175 AGF (DDN)
)	
MARK PALMER <i>et. al</i> ,)	
)	
Defendant.)	

**DEFENDANTS' JOINT CONSENTED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS**

COME NOW Defendants Robert Wolfe, Chuck Wolfe, Joseph Gabrick and Mark Palmer, by and through their respective undersigned counsel, and hereby jointly move this Court to enter its Order extending to March 8, 2016 the deadline to file motions to suppress tangible evidence, statements or evidence obtained through electronic surveillance. In support of their motion, to which the Government has no objection, Defendants state as follows:

1. On October 7, 2015 the Court entered an Order requiring Defendants to file pretrial motions to suppress tangible evidence, motions to suppress statements and motions to suppress evidence obtained through electronic surveillance ("Pretrial Motions") no later than December 15, 2015. *See* Doc. 180.

2. Through subsequent Motions and the Court's Orders on the same, the current deadline to file Pretrial Motions is March 1, 2016. *See* Doc. 213.

3. Defendants now move this Honorable Court for one week's additional time to file Pretrial Motions, specifically up to and including March 8, 2016.

4. Counsel for the undersigned Defendants have retained the services of an expert witness who is expected to supply information that will be used in connection with

the Motions counsel will file. Additional time is necessary for counsel to complete the consultation with that expert witness.

5. The additional time Defendants are requesting through this motion is necessary to afford counsel the reasonable time necessary to incorporate into the Pretrial Motions the information that results from the expert consultation.

6. Undersigned counsel for Defendant Joesph Gabrick communicated with Assistant U.S. Attorney James Delworth on behalf of all interested Defendants regarding the extension of time sought by this Motion, and the Government does not object to the relief requested by Defendants being granted by the Court.

WHEREFORE, for the foregoing reasons, the undersigned Defendants jointly request that the Court grant their motion for an extension of time to file motions to suppress and enter its Order extending the deadline for the filing of such suppression motions same to and including March 8, 2016.

Dated: March 1, 2016

Respectfully submitted,

DOWD BENNETT LLP

LUCCO, BROWN, THRELKELD &
DAWSON

By: /s/ James E. Crowe, III
James E. Crowe, III #50031MO
7733 Forsyth Boulevard, Suite 1900
St. Louis, Missouri 63105
Telephone: (314) 889-7300
Fax: (314) 863-2111
Email: jcrowe@dowdbennett.com

By: /s/ J. William Lucco (with permission)
J. William Lucco #1701835IL
Christopher P. Threlkeld #6271483IL
224 St. Louis Street
Edwardsville, Illinois 62025
Telephone: (618) 656-2321
Fax: (618) 656-2363
Email: blucco@lbtdlaw.com
cthrelkeld@lbtdlaw.com

Attorney for Defendant Joseph Gabrick

Attorneys for Defendant Charles Wolfe

BOROWIAK LAW FIRM

THE LAW OFFICES OF
SHELBY M. COWLEY

By: /s/ Zachary J. Borowiak
Zachary J. Borowiak #58855MO
225 South Meramec, Suite 1100
St. Louis, Missouri 63105
Telephone: (314) 537-2351
Fax: (314) 269-1042
Email: borowiaklaw@gmail.com

By: /s/ Shelby M. Cowley (with permission)
Shelby M. Cowley #62819MO
1717 Park Avenue
St. Louis, MO 63104
Telephone: (314) 721-1024
Fax: (314) 446-4700
Email: cowley_shelby@yahoo.com

Attorney for Defendant Robert Wolfe

Attorney for Defendant Mark Palmer

THE MUTRUX LAW FIRM

By: /s/ Tyson Mutrux (with permission)

Tyson Mutrux #63117MO
1717 Park Avenue
St. Louis, Missouri 63104
Telephone: (314) 270-2273
Fax: (314) 884-4333
Email: tyson@mtruxlaw.com

Attorney for Defendant Mark Palmer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 1st day of March, 2016, a true and correct copy of the foregoing was filed with the Court using the CM/ECF system, and service upon all participants in the case who are CM/ECF users will be accomplished by operation of that system.

/s/ James E. Crowe, III